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May 30, 2023

VIA ECF

Honorable Michael B. Kaplan, U.S.B.J. United States Bankruptcy Court for the District of New Jersey 402 East State Street Courtroom #8 Trenton, N.J. 08608

Re: In re LTL Management LLC

Bankr. Case No.: 23-12825-MBK

Dear Judge Kaplan:

As the Court is aware, this firm is proposed counsel to the Legal Representative for Future Talc Claimants ("FCR"), Randi S. Ellis, in the above-referenced case. We write on behalf of the FCR in response to the May 26, 2023 submission from Maune Raichle Hartley French & Mudd, LLC ("MauneRaichle") objecting to the retention of Walsh Pizzi O'Reilly Falanga LLP ("Walsh") as counsel to the FCR in this case.

It is respectfully submitted that the Court give no weight to the objection filed by MauneRaichle and enter the proposed Order authorizing the retention of Walsh as counsel to the FCR. In addition to being untimely, the "objection" is nothing more than the continuation of the Firm's campaign of ad hominem attacks. It contains no legal argument and cites to no basis under the Code or Rules to support an objection to the FCR's retention of Walsh. Accordingly, we respectfully submit Maune Raichle's objection should be overruled.

We thank the Court for its consideration of this response and ongoing attention to this matter.

Respectfully submitted,

s/Mark Falk

Mark Falk